

PUBLIC UTILITIES  
COMMISSION

15307-18-61

DOCKET NO. 04-0140

For approval of a merger transaction and related matters

**TIME WARNER TELECOM OF HAWAII, L.P.**  
**dba OCEANIC COMMUNICATIONS' FIRST SUBMISSION OF**  
**INFORMATION REQUESTS TO APPLICANTS**

## CERTIFICATE OF SERVICE

**J. DOUGLAS ING #1538-0**  
**PAMELA J. LARSON # 3980-0**  
 First Hawaiian Center  
 999 Bishop Street, 23rd Floor  
 Honolulu, Hawaii 96813  
 Telephone No. (808) 544-8300

Attorneys for Petitioner  
TIME WARNER TELECOM OF HAWAII, L.P.  
dba OCEANIC COMMUNICATIONS

BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF HAWAII

In the Matter of the Application	)	DOCKET NO. 04-0140
of	)	
	)	
PARADISE MERGERSUB, INC., GTE	)	
CORPORATIONS, VERIZON HAWAII INC.	)	
BELL ATLANTIC COMMUNICATIONS, INC.,	)	
AND VERIZON SELECT SERVICES INC.	)	
	)	
For approval of a merger transaction and related	)	
matters	)	
_____	)	

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**TIME WARNER TELECOM OF HAWAII, L.P.**  
**dba OCEANIC COMMUNICATIONS' FIRST SUBMISSION OF**  
**INFORMATION REQUESTS TO APPLICANTS**

and

**CERTIFICATE OF SERVICE**

WATANABE ING KAWASHIMA & KOMEIJI LLP  
A Limited Liability Law Partnership

J. DOUGLAS ING                   #1538-0  
PAMELA J. LARSON           # 3980-0  
First Hawaiian Center  
999 Bishop Street, 23rd Floor  
Honolulu, Hawaii 96813  
Telephone No. (808) 544-8300

Attorneys for Petitioner  
TIME WARNER TELECOM OF HAWAII, L.P.  
dba OCEANIC COMMUNICATIONS

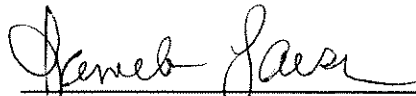
BEFORE THE PUBLIC UTILITIES COMMISSION  
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**dba OCEANIC COMMUNICATIONS' FIRST SUBMISSION OF**  
**INFORMATION REQUESTS TO APPLICANTS**

TIME WARNER TELECOM OF HAWAII, L.P. dba OCEANIC  
COMMUNICATIONS ("Oceanic"), by and through its attorneys, WATANABE ING  
KAWASHIMA & KOMEIJI LLP, hereby respectfully submits its Information Requests to  
Applicants.

DATED: Honolulu, Hawaii, August 30, 2004.



\_\_\_\_\_  
J. DOUGLAS ING  
PAMELA J. LARSON  
Attorneys for Petitioner  
TIME WARNER TELECOM OF HAWAII, L.P.  
dba OCEANIC COMMUNICATIONS

**TIME WARNER TELECOM OF HAWAII, L.P.**  
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**INFORMATION REQUESTS TO APPLICANTS**

**DEFINITIONS AND INSTRUCTIONS**

1. "TWTC" refers to Time Warner Telecom of Hawaii, L.P., dba Oceanic Communications. "PLNI" refers to Pacific LightNet, Inc.
2. The terms "Applicants," "Telco Hawaii" and "Verizon AssetCo" shall be as defined in the Application dated June 21, 2004 and shall include, but not be limited to, all of such entity's predecessor companies, present and former officers, attorneys, employees, servants, agents, and representatives, and any person acting on such entity's behalf. The "Company" shall refer to both Telco Hawaii and Verizon AssetCo.
3. The term "including" means "including, but not limited to."
4. "List," "describe," "explain," "specify," or "state" shall mean to set forth fully, in detail, and unambiguously each and every fact of which the Applicants or their agents or representatives have knowledge which is relevant to the answer called for by the Request.
5. The terms "document" or "documents" shall include, without limitation, any writings and documentary material of any kind whatsoever, both originals and copies (regardless of origin and whether or not including additional writing thereon or attached thereto), and any and all drafts, preliminary versions, alterations, modifications, revisions, changes and written comments of and concerning such material, including but not limited to: correspondence, letters, memoranda, notes, reports, directions, diagrams, schemata, studies, investigations, questionnaires and surveys, inspections, permits, citizen complaints, papers, files, books, manuals, instructions, records, pamphlets, forms, contracts, contract amendments or supplements, contract offers, tenders, acceptances, counteroffers or negotiating agreements, notices, confirmations, telegrams, communications sent or received, print-outs, diary entries, calendars, tables, compilations, tabulations, charts, graphs, maps, recommendations, ledgers,

accounts, worksheets, photographs and any other pictorial representations, tape recordings, movie pictures, videotapes, transcripts, logs, workpapers, minutes, summaries, notations and records of any sort (printed, recorded or otherwise) of any oral communication whether sent or received or neither, and other written records or recordings, in whatever form, stored or contained in or on whatever medium including computerized or digital memory or magnetic media that:

- A. are now or were formerly in your possession, custody or control; or
- B. are known or believed to be responsive to these Requests, regardless of who has or formerly had custody, possession or control.

6. The term “Application” shall mean the Application for Approval of Merger Transaction and Related Matters filed with the Hawaii Public Utilities Commission on June 21, 2004.

7. The term “date” shall mean the exact day, month and year, if ascertainable, or if not, the best approximation thereof, including relationship to other events.

8. The term “person” or “persons” means and includes any individual, committee, task force, division, department, company, contractor, state, federal or local government agency, corporation, firm, association, partnership, joint venture or any other business or legal entity.

9. The terms “identify” and “identity” when used with reference to a natural person mean to state his or her full name, present or last known address, present or last known telephone number, present or last known place of employment, position or business affiliation, his or her position or business affiliation at the time in question, and a general description of the business in which he or she is engaged.

10. The terms “identify” and “identity” when used with respect to any other entity mean to state its full name, the address of its principal place of business and the name of its chief executive officers.

11. The terms “identify” and “identity” with respect to a document mean to state the name or title of the document, the type of document (*e.g.*, letter, memorandum, telegram, computer input or output, chart, etc.), its date, the person(s) who authored it, the person(s) who signed it, the person(s) to whom it was addressed, the person(s) to whom it was sent, its general subject matter, its present location, and its present custodian. If any such document was but is no longer in the Applicants’ possession or subject to its control, state what disposition was made of it and explain the circumstances surrounding, and the authorization for, such disposition, and state the date or approximate date thereof.

12. The terms “identify” and “identity” with respect to any non-written communication mean to state the identity of the natural person(s) making and receiving the communication, their respective principals or employers at the time of the communication, the date, manner and place of the communication, and the topic or subject matter of the communication.

13. If the Applicants file a timely objection to any portion of a request, definition, or instruction, respond to or comply with the remaining portion(s).

14. In these requests the singular shall also be treated as plural and vice-versa.

15. Each response should include the name of the person(s) providing the response.

16. If any part of a document is responsive to any request, the whole document is to be produced, with the responsive portion clearly identified.

17. Please identify each and every document to which you assert a claim of privilege or objection to production by stating in writing a general description of the document, its title, number of pages, date of preparation, person(s) who prepared the document, any person(s) who received or reviewed the document in original or other form, and the current custodian(s) of the document, and state in writing the nature and basis for each claim of privilege or objection asserted for the document.

18. If the Applicants claim that any portion of a document is privileged, the Applicants shall provide those portions of the document to which the Applicants are not claiming a privilege until such claim of privilege is resolved. This instruction shall not waive any rights TWTC may have in connection with challenging any claim of privilege asserted by the Applicants.

19. These requests are continuing in nature and, thus, the Applicants are under a continuing duty to promptly supplement, correct or revise any response provided when the passage of time or change of circumstances would require a response to be supplemented, corrected or revised.

20. Each request should be answered in writing on a separate page. Each response should contain the question being answered.

**TIME WARNER TELECOM OF HAWAII, L.P.**  
**dba OCEANIC COMMUNICATIONS' FIRST SUBMISSION OF**  
**INFORMATION REQUESTS TO APPLICANTS**

**TWTC-IR-1    Ref.: Response to CA-IR-9.c.**

Please provide a copy of the interim agreement with Bearing Point, Inc., the selected back office provider identified in response to CA-IR-9.c.

**TWTC-IR-2    Ref.: Response to CA-IR-10.c. and 37.c.**

Please provide copies of the following documents identified in response to CA-IR-10.c and 37.c:

- a.     BearingPoint technical solution overview
- b.     BearingPoint linked services presentation
- c.     Term sheet with BearingPoint for the back office systems integration.

**TWTC-IR-3    Ref.: Response to CA-IR-35.**

Please provide a copy of the transition plan described in response to CA-IR-35.

**TWTC-IR-4    Ref.: Application, Exhibit C, Section 4.1**

Please provide a copy of the following documents referred to in Section 4.1 of the Transition Services Agreement:

- a.     The Linked Services Report.
- b.     The Termination Schedule.
- c.     The Opt-Out Notices.

**TWTC-IR-5    Ref.: Application, Exhibit C, Section 4.2.**

Please provide a copy of the Cutover Plan referenced in Section 4.2 of the Transition Services Agreement.

**TWTC-IR-6    Ref.: Application, Page 14.**

Please describe in detail the “extensive plans to create and establish in Hawaii substantially all of the major required back office functions currently handled by Verizon Hawaii’s affiliates on the mainland.” If such plans are in writing, please provide a copy of all such plans.



**TWTC-IR-7 Transition Period**

During the term of the Transition Services Agreement, will CLECs have to modify any processes or procedures relating to preordering, ordering and provisioning, maintenance and/or billing. If so, please identify which ones will be affected and how.

In responding to TWTC-IR-8 through 16, please explain how the Company plans to address the issues after Closing both during the period covered by the Transition Services Agreement and upon expiration or termination of the Transition Services Agreement.

**TWTC-IR-8 System and Support - Pre ordering:**

- a. Will the Company provide an electronic means for CLECs to access Customer Service Records ("CSRs")? If not, what method and procedure is being proposed and what is the timeframe needed to comply with a CSR request?
- b. How will the Company insure that requests for CSRs do not trigger sales/retention efforts by the Company's retail organization?

**TWTC-IR-9 Ordering and Provisioning**

- a. What systems will be available to accept electronic transmission of Access Service Requests (ASRs) and Local Service Requests (LSRs)
- b. Will the Company's system conform to industry standards such that 3<sup>rd</sup> party interface vendor such as Quintessent are able to bond with the Company's LSR/ASR system.
- c. When will the Company publish business rules that will allow CLECs or their authorized vendor to map LSR/ASR specifications to the Company's system.
- d. How will CLECs receive Firm Order Confirmations (FOCs), Design Layout Records (DLRs) and order completion information?
- e. How will the Company handle number porting including coordinated cutovers, line side ports and out of hours ports?
- f. Will there be special ordering procedures for interconnection and ancillary trunk groups (911, Operator Services, Directory Assistance)?

- g. How will the Company handle the following miscellaneous service requests:
  - i. Primary Interexchange Carrier PIC/CARE
  - ii. Line Information Data Base (LIDB)

**TWTC-IR-10 Generic Network Provisioning & Interfaces**

- a. How will the Company insure that CLEC customer name information is populated into the Calling Name (CNAM) database?
- b. Will the Company maintain its existing Operator Compensation Number (OCN), Carrier Identification Codes (CICs) and other carrier identifiers?

**TWTC-IR-11 Maintenance**

- a. Will the Company have a wholesale maintenance center?
- b. How does the Company propose that CLECs submit and determine the status of trouble tickets?
- c. What will be CLEC testing obligations for UNE products?

**TWTC-IR-12 Billing**

- a. Will the Company maintain a standard CCABs billing platform and bill format?
- b. Will the Company retain all existing CLEC Bill Account Numbers (BANs)
- c. Will the Company provide electronic bills?
- d. Will the Company maintain the existing Universal Service Order Code (USOC) structures and definitions?
- e. Will the Company be able to identify and bill reciprocal compensation on two way trunk groups?
- f. Will the Company honor existing (Verizon) special access discounts?
- g. Will the Company provide an electronic system for input of billing disputes?
- h. Will the Company provide billing conversion to isolate Hawaii CLEC accounts for: VADI, Special Access, DSL, unbundled local loops (ULL), and Operator Services?

**TWTC-IR-13 Performance Reporting & Guarantees .**

Will the Company maintain the existing JPSA service standards and publish the results electronically?

**TWTC-IR-14 Publication of practices and procedures.**

- a. When will the following documentation be available:
  - 1. Product Installation Interval Guidelines
  - 2. Provisioning Escalation List
  - 3. Maintenance Escalation List
  - 4. Billing Disputes Escalation List
  - 5. Pole and Conduit Negotiations Contact
  - 6. System Interface Business Rules
  - 7. Interconnection procedures and contacts
- b. Will the above documentation be available via a corporate website? If so, when?
- c. Will the Company's tariffs and pending tariff applications be available on a website similar to the existing Verizon Wholesale Website?

**TWTC-IR-15 Ancillary services**

- a. Given that Collocation coordination, reports and service request are all handled on the mainland, when will the Company establish a collocation coordinator and when will process and procedures be available?
- b. Will the Company maintain a Directory and Yellow Pages organization?
- c. Will the Company maintain its own SS7 network?

**TWTC-IR-16 CLEC Account Manager (support personnel) Wholesale organization Structure**

- a. Will the Company have a separate wholesale organization?
- b. Will the Company sponsor a CLEC user group forum?

- c. Will the Company sponsor an electronic system “Change Management Forum”?
- d. Will CLECs be required to submit new profiles or will Verizon share all pertinent CLEC profile information with the Company?

**Joinder and Adoption of PLNI and Other Parties’ Information Requests.**

TWTC hereby joins in, adopts and incorporates by reference the Information Requests submitted by PLNI, and TWTC reserves the right to submit Supplemental Information Requests based upon the Applicant’s responses to those Information Requests.

TWTC further joins in, adopts and incorporates by reference any Information Request submitted by the Division of Consumer Advocacy or any other party or participant to this Docket to the extent that such Information Requests relate to Issue Number 10 set forth in the Stipulate Prehearing Order submitted by the parties in this Docket, and TWTC reserves the right to submit Supplemental Information Requests based upon the Applicant’s responses to those Information Requests.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the First Submission of Information Requests to Applicants upon the following Parties and Participant by hand delivery or by mail, postage prepaid and properly addressed.

Division of Consumer Advocacy  
335 Merchant Street  
Room 326  
Honolulu, HI 96813  
E-Mail: **Cheryl.S.Kikuta@dcca.hawaii.gov**  
Facsimile Number: (808) 586-2780

6 copies

Paradise MergerSub, Inc.  
c/o Alan M. Oshima, Esq.  
Michael H. Lau, Esq.  
Kent D. Morihara, Esq.  
Oshima Chun Fong & Chung LLP  
841 Bishop Street, Suite 400  
Honolulu, HI 96813  
E-Mail: **amo@ocfc.com**  
**mhl@ocfc.com**  
**kdm@ocfc.com**  
Facsimile Number: (808) 531-8466

1 copy

GTE Corporation, Verizon Hawaii Inc.,  
Bell Atlantic Communications, Inc., and  
Verizon Select Services Inc.  
c/o Leslie Alan Ueoka, Esq.  
Blane T. Yokota, Esq.  
Verizon Corporate Services Group Inc.  
P.O. Box 2200  
Honolulu, HI 96841  
E-Mail: **les.ueoka@verizon.com**  
**joel.matsunaga@verizon.com**  
Facsimile Number: (808) 546-7621

1 copy

Department of Defense  
c/o Mr. Richard B. Lee  
Snavelly King Majoros O'Connor & Lee, Inc.  
1220 L Street, NW – Suite 410  
Washington, DC 20005  
E-mail: [dlee@snavelly-king.com](mailto:dlee@snavelly-king.com)  
[Stephen.melnikoff@hgda.army.mil](mailto:Stephen.melnikoff@hgda.army.mil)  
Facsimile Number: (202) 842-4966

1 copy

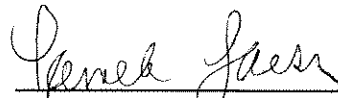
Pacific LightNet, Inc.  
c/o Ms. Lisa Suan  
737 Bishop Street  
Suite 1900  
Honolulu, HI 96813  
Email: [lsuan@plni.net](mailto:lsuan@plni.net)  
[laura@mahooklaw.com](mailto:laura@mahooklaw.com)  
[wtam@ahfi.com](mailto:wtam@ahfi.com)  
Facsimile Number: (808) 791-3119

1 copy

Individual Retirees/IBEW  
c/o Herbert R. Takahashi  
Stanford H. Masui  
Danny J. Vasconcellos  
Rebecca L. Covert  
Takahashi, Masui, Vasconcellos & Covert  
345 Queen Street, Room 506  
Honolulu, HI 96813  
E-Mail: [rcover@hawaii.rr.com](mailto:rcover@hawaii.rr.com)  
Facsimile Number: (808) 531-9894

1 copy

Dated: August 30, 2004.



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J. DOUGLAS'ING

PAMELA J. LARSON

Attorneys for Time Warner Telecom of Hawaii  
L.P. dba Oceanic Communications

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